

Remarks

Claims 1-38 were originally filed. Claims 1, 4, and 38 were previously amended and Claim 7 previously canceled.

Rejection Under 35 U.S.C. Section 102

Claims 1-6, 8-27, and 36-38 were rejected under Section 102(c) as being anticipated by U.S. Patent Application Publication No. 2004/ 0012872 (Fleming et al., hereinafter referred to as Fleming). This rejection is respectfully traversed for the following reasons.

Applicants have previously addressed this rejection in remarks that are incorporated herein by reference, but the Examiner has maintained the 102 rejection, based upon Fleming's disclosure of epoxy-functional silicones in Paragraphs [0080] and [0082]. Such reactive species are similarly described by Applicants, however, (at page 8, line 21, and page 9, lines 18-22) in the section of Applicants' specification entitled "(i) **Organic** Reactive Species" (which begins at page 6, line 8, and ends at page 10, line 16).

Since such materials are categorized by Applicants as being **organic** reactive species, **the proviso of Applicants' claims applies**. For example, Applicants' Claim 1 expressly states the following: **"with the proviso that when said reactive species is organic the composition further comprises a said hybrid organic/inorganic reactive species and/or a plurality of inorganic particles."**

Unlike Applicants, Fleming does not appear to teach or suggest the use of epoxy-functional silicones or other organic reactive species in combination with hybrid organic/inorganic reactive species (which are described by Applicants at page 10, line 17, through page 11, line 17) and/or inorganic particles (described at page 35, line 21, through page 39, line 10). Since Fleming neither teaches nor suggests the use of the substantially inorganic compositions specified by Applicants' claims, Applicants respectfully submit that their claimed process is indeed patentable over Fleming and respectfully request that the rejection under Section 102 be withdrawn.

Rejection Under 35 U.S.C. Section 103

Claims 28-35 were rejected under Section 103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/ 0012872 (Fleming et al., hereinafter referred to as Fleming) in view of U.S. Patent Application Publication No. 2004/ 0198582 (Borrelli et al., hereinafter referred to as Borrelli). This rejection is respectfully traversed for the following reasons.

Applicants have previously addressed this rejection in remarks that are incorporated herein by reference, but the Examiner has maintained the 103 rejection, based upon the continued assertion that Borelli discloses the use of “three-dimensional structures such as gratings to deposit a semiconductor material such as silica.”

As Applicants previously explained in detail, however, the step referenced by the Examiner is **not a deposition** of any sort, and the material (silica) assertedly being “deposited” is **not a semiconductor**. Silica is silicon dioxide, which is **not** a semiconductor. (The Examiner appears to be confusing the compound “silica” with the element “silicon,” which is a semiconductor.)

The combination of Fleming and Borelli thus fails to provide Applicants’ claimed invention by failing to teach or suggest at least the use of Applicants’ substantially inorganic photoreactive composition, the use of a deposition step, and the use of a semiconductor material. Applicants therefore respectfully submit that their claimed process is indeed patentable over this combination of references and respectfully request withdrawal of the rejection under Section 103.

Concluding Remarks

It is believed that Applicants’ claims are in condition for allowance, and reconsideration and allowance of Applicants’ claims are respectfully requested.

Respectfully submitted,

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